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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAUL HYON KIM,

Defendant.

Case No.: 2:25-cr-00093-JAD-EJY

Stipulation for a Protective Order

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the defendant, PAUL HYON KIM, the public, or any third party not directly related to this case, certain unredacted discovery (the “Protected Material”) in this case. The parties state as follows:

1. On March 27, 2025, the government filed a Criminal Complaint charging Kim with one count of unlawful possession of an unregistered firearm (that “firearm” being a “destructive device,” i.e. Molotov cocktail) in violation of 26 U.S.C. § 5861(d) and arson in violation of 18 U.S.C. § 844(i). ECF No. 1.

2. On April 9, 2025, a Federal Grand Jury returned an Indictment charging Kim with two counts of arson of property used in interstate commerce and one count of attempted arson

1 of property used in interstate commerce in violation of 18 U.S.C. § 844(i) and one count of
2 possession of an unregistered firearm in violation of 26 U.S.C. §§ 5841, 5861(d), and 5871. ECF
3 No. 23. The trial date is currently set for June 17, 2024.

4 3. The government has and anticipates obtaining more voluminous discovery that
5 contains photos, communications between law enforcement agencies, witness statements, etc.
6 The government believes that dissemination of the unredacted discovery (“the Protected
7 Material”) in its entirety could potentially unnecessarily disseminate personal identifying
8 information and other private information not subject to disclosure. In order to expedite the
9 provision of discovery to defense counsel, the parties hereby stipulate to a protective order.

10 4. In order to prevent dissemination of the Protected Material, the parties intend to
11 restrict access to the Protected Material in this case to the following individuals: attorneys for
12 all parties and their legal support staff. The defendant, PAUL HYON KIM, shall not obtain a
13 copy of the Protected Material nor shall the defendant be able to review the materials covered
14 by this Protective Order outside the presence of his attorney.

15 5. Without leave of Court, the Covered Individuals shall not:

- 16 a. make copies for, or allow copies of any kind to be made by any other person of the
17 Protected Material in this case or permit dissemination of the Protected Material, to
18 include leaving a copy of the Protected Material with the defendant unattended;
19 b. allow any other person to watch, listen, or otherwise review the Protected Material;
20 c. use the Protected Material for any other purpose other than preparing to defend
21 against or prosecute the charges in the indictment or any superseding indictment
22 arising out of this case; or
23 d. attach the Protected Material to any of the pleadings, briefs, or other court filings
24 except to the extent those pleadings, briefs, or filings are filed under seal.

6. Nothing in this stipulation is intended to restrict the parties' use or introduction of the Protected Material as evidence at trial or support in motion practice. If the defendant proceeds to trial or any evidentiary hearing, the parties will confer to determine whether the terms of this stipulation should be revisited.

7. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

8. The defendant hereby stipulates to this protective order.

DATED this April 21, 2025.

Respectfully submitted,

For the United States:

SIGAL CHATTAH
United States Attorney

/s/ Jacob H. Operskalski
JACOB H. OPERSKALSKI
Assistant United States Attorney

For the Defense:

/s/ Adam M. Solinger
ADAM M. SOLINGER
Lead Attorney for PAUL HYON KIM

IT IS SO ORDERED:


HONORABLE LAYNA J. YOUCHAK
United States Magistrate Judge

April 22, 2025
Date